

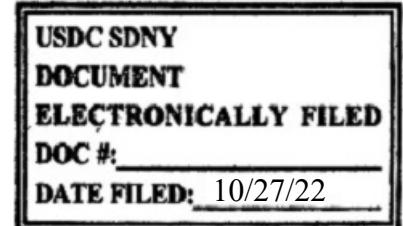
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October 24, 2022



VIA ECF

Honorable Barbara Moses
United States Magistrate Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 740
New York, NY 10007
Telephone: (212) 805-0228

MEMO ENDORSED

Re: *Fletcher v. Commissioner of Social Security*,
Civil Action No. 1:22-cv-02873-ER-BCM

Dear Judge Moses,

We write on behalf of plaintiff, Keisha Natalie Fletcher, and with the consent of the defendant, to request a 45-day extension of time to file plaintiff's motion for judgment on the pleadings as per the May 9, 2022 Scheduling Order. Plaintiff's motion is due on October 24, 2022. Plaintiff respectfully requests an extension of time up to and including December 7, 2022. This is plaintiff's first request for an extension.

The additional time is necessary because our office has several closely scheduled deadlines in social security matters and counsel believes that additional time is necessary to review the record and prepare the brief in this case.

Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. On **August 24, 2022**, Plaintiff served a written proposal for settlement on counsel for the Commissioner summarizing Plaintiff's strongest arguments;

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- b. On **September 23, 2022**, the Parties filed a joint letter advising the Court that the parties are unable to resolve the case and are proceeding to brief their respective positions;
- c. Plaintiff to serve her motion for judgment on the pleadings on or before **December 7, 2022**;
- d. Defendant to serve its response/cross-motion on or before **February 6, 2023**; and
- e. Plaintiff to serve her reply (if any) on or before **February 27, 2023**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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Application GRANTED to the extent that plaintiff may have an extension of 30 days, to **November 23, 2022**, to file her motion for judgment on the pleadings. The Court notes that plaintiff was served with the e-CAR on July 25, 2022. Consequently, with this extension, she will have a total of 121 days to review the record and prepare the brief. The Commissioner's response and cross-motion will be due **January 23, 2023**. Plaintiff's optional reply will be due **February 14, 2023**. SO ORDERED.



Barbara Moses
United States Magistrate Judge
October 26, 2022